

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

ANDREA YARBRO,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.:
)	2:21-cv-2396-TLP-cgc
SAIA MOTOR FREIGHT LINE,)	
LLC,)	
)	
Defendant.)	

JOINT MOTION FOR EXTENSION OF ALL DEADLINES

Plaintiff Andrea Yarbro and defendant Saia Motor Freight Line, LLC (“Saia” and/or “Defendant”) hereby jointly request a ninety (90) day extension of trial and all pending deadlines. As grounds for this motion the parties state as follows:

1. Pursuant to the Court’s January 27, 2023 Order [Doc. 43], the current discovery deadline is April 16, 2023, the dispositive motion deadline is May 4, 2023, and trial is set for July 24, 2023.
2. Undersigned counsel for the plaintiff is leaving his employment at The Reaves Law Firm, and another attorney has not been assigned to this case to date, nor is there any indication at this moment who will be representing plaintiff in this matter.

3. As a result of this change in plaintiff's representation, depositions set for this week were cancelled as plaintiff would not have counsel for said depositions.

4. Additionally, there remain many witnesses counsel for plaintiff intends to depose for which subpoenas will be necessary.

5. Finally, undersigned counsel for defendant is now scheduled to take the bar exam for the State of Mississippi which is set the same week as trial of this matter.

6. Due to the above factors, the parties in good faith hereby request an additional ninety (90) days of trial and all pending deadlines.

7. This extension will not prejudice any party.

Wherefore, the parties request that this Honorable Court continue trial and all pending deadlines for a period of ninety (90) days.

Respectfully submitted this 1st day of March, 2023.

ATTORNEY FOR PLAINTIFF:

/s/ Jason R. Hines (w/permission)

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/s/ Yvonne N. Maddalena

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